

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

MARTIN GOTTESFELD,

Defendant

16-CR-10305-NMG

**DECLARATION OF SPECIAL AGENT MICHAEL BORDINI**

I, Michael Bordini, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation.
2. Based on conversations with FBI Special Agent Michael Tunick, the main case agent in this investigation, other members of the prosecution team, and other evidence, I am aware of a pattern of behavior of Defendant Gottesfeld and Ms. Gottesfeld communicating directly with members of the U.S. Attorney's Office (USAO).
3. Specifically, I am aware that on March 9, 2018, Mr. Gottesfeld addressed AUSA D'Addio directly in Court, accusing him of "cover[ing] up" "child torture" and calling another member of the USAO a "pedophile."
4. On March 17, 2018, AUSA D'Addio received an email from the email account "mgottesfeld@gmail.com" calling him a "lying scumbag."
5. On March 22, 2018, the "FreeMartyG" twitter account retweeted an article calling a former member of the prosecution team a "pedophile" and stating "Thank you prosecutor D'Addio for mentioning the below matter yet again on the record and therefore enshrining it for all time. You are still an epic douche bag though."
6. On June 13, 2018, the "FreeMartyG" twitter account tweeted a series of messages including one calling members of the USAO "despicable federal scumbags."
7. Today, June 14, 2018, I spoke with G.K., the 80-year-old mother of one of the prosecutors in the above referenced case. G. K. told me that last night, at approximately, 9:20 p.m., she received a call at her home from a woman who identified herself as "Dana Barach." "Ms. Barach" claimed to be an "independent journalist" working on a story about a case that her son was prosecuting. When G.K. informed Ms. Barach that she was not going to answer any questions, Ms. Barach persisted in making statements about "child abuse." G.K. hung up the phone and ended the conversation.

8. I also spoke today with R.D., the mother of another prosecutor in this case. She told me that last night, at approximately 9:25 p.m., she too received a call at her home from a woman who identified herself as "Dana Barach" and claimed to be a journalist. She attempted to ask R.D. about her son. R.D. informed Ms. Barach that she was not going to answer any questions. She too then hung up the phone and ended the conversation.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 14, 2018. 28 U.S.C. §1746.

  
Special Agent Michael Bordini